

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

GAIL RICHARDS, individually and on
behalf of herself and all others similarly
situated

Plaintiff

vs.

CLIENT SERVICES, INC.

Defendant

CLASS ACTION

NO. 14-cv-1402

(JUDGE A. RICHARD CAPUTO)

(FILED ELECTRONICALLY)

ORDER

AND NOW, this _____ day of _____ 2015, upon consideration
of Plaintiff's unopposed Motion for Leave to Exceed Page Limits, it is hereby
ORDERED that said Motion is GRANTED.

BY THE COURT:

A. RICHARD CAPUTO,
United States District Judge

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MOTION FOR LEAVE TO EXCEED PAGE LIMIT

Plaintiff, by and through her undersigned counsel, hereby moves for leave to file a brief in excess of the limits of Loc. R. Civ. P. 7.8(b) and states as follows:

1. On May 20, 2015, Plaintiff filed her Motion for Preliminary Approval of Class Action Settlement. (Doc. No. 21).

2. This is a Middle District of Pennsylvania class action where Plaintiff is seeking approval for a class-wide settlement of claims arising under the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq.

3. Preliminary approval of a class settlement involves two essential steps: (A) a preliminary determination of whether the elements of Fed. R. Civ. P. 23 governing class certification can be met, and (B) whether a class settlement is prima facie fair, reasonable and adequate. *See In re NFL Players Concussion Injury Litig.*, 775 F.3d 570 (3d Cir. 2014); *Wallace v. Powell*, 301 F.R.D. 144, 159-60 (M.D. Pa. 2014).

4. As such, legal argument for preliminary approval in this case involves briefing two substantial questions, which could be addressed in two substantial briefs.

5. In the effort to avoid redundancy (e.g. two statements of fact, procedure, the settlement terms), Plaintiff seeks to file one Memorandum in Support of Preliminary Approval which addresses both legal questions – Rule 23 certification and fairness of settlement, with said memorandum appearing on the docket at ECF No. 22, filed May 20, 2015.

6. Filing one brief (as well as one appendix of exhibits) addressing all of the inquiries for preliminary approval is economical for the Court and parties.

7. Plaintiff's Memorandum is approximately 6000 words, and thus is in excess of the limits imposed by Loc. R. Civ. P. 7.8(b).

8. For the reasons set forth above, Plaintiff requests leave be granted to file a brief in excess of the Local Rule limitation.

9. The undersigned certifies pursuant to Loc. R. 7.1 that Defendant Client Services, Inc. consents to this Motion.

WHEREFORE, Plaintiff should be granted leave to file a brief in excess of the limitations set forth in Local R. Civ. P. 7.8(b).

Date: 5/20/15

/s/ Cary L. Flitter
CARY L. FLITTER
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**Attorneys for Plaintiff and the
Class**

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CERTIFICATE OF SERVICE

I, ANDREW M. MILZ, hereby certify that a copy of Plaintiff's Motion for
Leave to Exceed Page Limit has been electronically filed with the Clerk of Court
using the CM/ECF system, which sent notification of such filing to:

Andrew Schwartz, Esquire
MARSHALL DENNEHY
WARNER COLEMAN & GOGGIN
2000 Market Street, Suite 2300
Philadelphia, PA 19103
Attorney for Defendant

Date: 5/20/15

/s/ Andrew M. Milz

ANDREW M. MILZ

Said document is available for viewing and downloading from the ECF
system.

Date: 5/20/15

/s/ Andrew M. Milz

ANDREW M. MILZ